

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

MARTIN RENEE WILLIAMS

CIVIL ACTION NO. 16-0216

VERSUS

VERMILION PARISH SHERIFF

MAGISTRATE JUDGE HANNA

PROPOSED SUPPLEMENTAL VOIR DIRE QUESTIONS

NOW INTO COURT, through undersigned counsel and pursuant to the instructions of this Honorable Court, comes Defendant, Sheriff Michael Couvillon, who herein submits the following proposed supplemental *voir dire* questions for consideration in the above-captioned matter:

1. Have you ever served on a jury before?
2. If you served on a criminal jury, what was the verdict?
3. If you served on a civil jury, what was the verdict?
4. Have you or any member of your family ever been the plaintiff in a civil suit, or had a claim made against you before? If so, describe the nature and outcome of the suit or claim.
5. Have you or any member of your family ever been the defendant in a civil suit, or had a claim made against you before? If so, describe the nature and outcome of the suit or claim.
6. Have you ever had an encounter with law enforcement? If so, briefly describe that experience. (Ask that the prospective juror be questioned outside the presence of others.)
7. Have you or any members of your family ever been involved in law enforcement? If so, please describe the involvement.
8. Have you or any members of your family ever been the victim of employment discrimination? If so, briefly describe your experience. (Ask that the prospective juror be questioned outside the presence of others.)
9. Do you have any information or any preconceived notions regarding this case?
10. Do you know any of the parties involved in this case?

11. Is there any reason why you feel that you cannot serve as a juror in this case?

Respectfully submitted,
USRY & WEEKS, APLC

/s/Timothy R. Richardson
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Counsel for the Vermillion Parish Sheriff

CERTIFICATE OF SERVICE

I hereby certify that, on this 4th day of September, 2018, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the court's electronic filing system. I also certify that a copy of the foregoing will be sent to all non-CM/ECF participants by United States Mail, properly addressed and postage prepaid.

/s/Timothy R. Richardson